



Annual Performance Report

OMB No. 2010-0032
Expiration Date: 06/30/03

Facility Name: Shipley Company, LLC
Performance Track ID #: A010018
Annual Performance Report #: 1
Reporting Year: 2001
Due Date: 07/01/2002

Section A. General Facility Information

Please supply or revise information in A.1 – A.8 as is necessary to ensure that it is accurate, complete, and up-to-date. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

A.1 Name of your facility: Shipley Company, LLC

A.2 Name of your parent company: Rohm and Haas Company

A.3 Facility contact person for the Performance Track program:

Name: Mrs. Rose Perkins

Title: Environmental Engineering Manager

Phone: (508) 229-7212

Fax: (508) 460-0522

E-mail: rperkins@shipley.com

A.4 Facility's location

Street Address: 455 Forest Street

Address (cont.):

City: Marlborough

State: MA

Zip Code: 01752

A.5 Facility's Website address (if any):

www.shipley.com

A.6 Number of employees (full-time equivalents) who currently work in the facility:

500-1000

A.7 Does your company meet the Small Business Administration definition of a small business for your sector?

No

A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility:

325998

A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them here:

No

A.10 Please update the list of environmental requirements that apply to your facility by listing any changes that have taken place during this reporting period. If you have no changes to report, please enter "No changes".

No Changes.

Section B. Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*.

a. Was an EMS audit or other assessment done by an independent third party?

Yes

If yes, please provide the type (e.g., ISO 14001 certification), the scope, and the dates (mo/yr) of each assessment.

Type	Scope	Dates (mo/yr)
ISO 14001 Re-certification	Re-certification (3yr) all elements of EMS audited.	08/2001

b. Was an internal or corporate EMS audit conducted? Yes

If yes, please provide the scope and dates (mo/yr) of each audit.

Scope	Date (mo/yr)
Legal Requirements and Emergency Response (4.3 Planning, 4.4 Implementation and Operation, 4.5 Checking and Corrective Action)	02/01
4.2 Environmental Policy, 4.3 Planning, Operational Control, Env. Aspects (4.4 Implementation and Operation, 4.5 Checking and Corrective Action, 4.6 Management Review)	04/01
EMS Management and Training (4.3-4.4)	08/01

c. Was a compliance audit conducted?

Yes

If yes, please provide the scope and the dates (mo/yr) of each audit, and indicate who conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Scope	Dates	Who conducted the audit
Hazardous Waste and Air Facilities Services	04/2001	Facility Staff
Hazardous Waste R&D	05/2001	Facility Staff
Hazardous Waste and Air Pilot Plant	08/2001	Facility Staff
Hazardous Waste, Wastewater, and Air Shipley Ronal	11/2001	Facility Staf

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audit

No non-conformities found in EMS audits by internal staff or third party registrar. Compliance issues were minor labeling and storage issues that were corrected.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed?

04/2002

Who headed the review? Name: Mrs. Rose Perkins Title: Environmental Engineering Manager

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001?

Yes

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects?

06/2001

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. You may limit the summary to environmental aspects that are *significant* and towards which progress has been made during the *reporting year*. In cases where *progress* relates specifically to a Performance Track performance commitment, complete the Environmental Aspect column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C."

Environmental Aspect	Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)
Energy	See Section C
Water	See section C
Hazardous Waste	see section C
Wastewater Treatment Optimization	Substituted use of several regulated chemicals to NalMet reagent. Automated chemical feed system which eliminated manual chemical handling and reduce risk of employee exposure.

Section C. Environmental Performance Commitments

Please use the tables below to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment.

C.1 Performance Commitment 1

- a. Use this table to report data related to your first performance commitment.

Category:	Water Use				
Aspect :	Total Water Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	13750000	8870000			Optional:
Measurement Units	gallons				
Normalizing Factor	1.0	0.95			Optional:
Basis for your Normalizing Factor	Number of batches made in Shipley Ronal Mfg				
Normalized Quantity* (per year)	13750000	9336842.1			13000000
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We eliminated inefficient mix tank preparations and improved cleaning practices. Initial data in application was reported on a per batch basis with less than one year of data but assumed a 5% reduction in water. The basis was changed to 1999 since we had a complete year of data. More than a 30% reduction has occurred since 1999.

If you have additional information that you would like to include please attach it here:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

None

C.2 Performance Commitment 2

- a. Use this table to report data related to your second performance commitment.

Category :	Energy Use				
Aspect :	Total Energy Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	26442368	26208786			Optional:
Measurement Units	KwH				
Normalizing Factor	1.0	1.18			Optional:
Basis for your Normalizing Factor	Number of Sources				
Normalized Quantity* (per year)	26442368	22210835.6			25120250
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Occupancy Sensors were placed throughout two large areas of the facility (participated in Mass Electric Rebate Program).

Increased employee awareness on electrical use, provided notices to shut off computers and light sources in areas.

The energy aspect in our application was for reductions in natural gas usage. This reduction involved capital expenditures and could not be implemented due to economic conditions. Therefore, we focused on low cost rebate programs to reduce electrical energy use by the same reduction target of 5%. We achieved over 15% reduction in the first year.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).
none

C.3 Performance Commitment 3

- a. Use this table to report data related to your third performance commitment.

Category :	Waste				
Aspect :	Hazardous Solid Waste				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	900	520			Optional:
Measurement Units	tons				
Normalizing Factor	1.0	0.93			Optional:
Basis for your Normalizing Factor	Total production quantity (kg)				
Normalized Quantity* (per year)	900	559.1			459
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

We have evaluated several treatment technologies and have not found an option that is technically and economically feasible. We have applied for a National Environmental Technology Institute(NETI)grant to research advanced oxidation and bioreactor technologies for not only treating the wastewater but also reusing the water in the process. NETI is located at UMASS Amherst, MA. We have also initiated a pilot treatment study with Tenergy Water. In the interim, we are trying to better segregate waste streams and analyze all sources of wastewater contributing to this waste.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

none

C.4 Performance Commitment 4

- a. Use this table to report data related to your fourth performance commitment.

Category :	Materials Use				
Aspect :	Hazardous Materials Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	1999	2001	2002	2003	2003
Actual Quantity (per year)	483416	371331			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	1.34			Optional:
Basis for your Normalizing Factor	number of batches				
Normalized Quantity* (per year)	483416	277112.7			386733
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Modifications to all mix tanks to allow solvent to recirculate during cleaning were completed in 2001. We also installed spray balls to all mix tanks to allow better distribution of cleaning solvent in the tank for more effective cleaning with less solvent. Our 20% reduction target was exceeded in our first year.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

None.

Section D.
Public Outreach and Performance Reporting

- D.1** Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).
Distributed an annual EHS report (also available on our website) to local officials, LEPC, and all our employees.

Attachment:

Any attachments will be located at the end of the report.

- D.2** Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Report available to the public. Please check as many as appropriate.

Web Site

URL: www.shipley.com

Other:

Section E.

Self-Certification of Continued Program Participation

On behalf of Shipley Company, LLC,
(name of my facility)

I certify that

-- I have read and agree to the terms and conditions as specified in the *National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;

-- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;

-- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

-- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance;

-- Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environment Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date

Printed Name

Mr. Thomas Pilla

Title

VP Global Operations

Phone Number

508-229-7093

E-mail Address

tpilla@shipley.com

Facility Name

Shipley Company, LLC

Facility Street Address

455 Forest Street

Marlborough, MA 01752

Performance Track ID#

A010018

Appendix:

Do you want to add Appendix?

When adding additional comments, please refer to question number.

Comments:

Attachment:

View attachments here:

[Water Use Reduction Project Overview '02.doc](#)

[NETI letter.doc](#)

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.